

1 THE HONORABLE RICARDO S. MARTINEZ
2
3
4
5
6
7

8 UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 HAMEAD IBRAHIM ABDULLAHI,

14 Defendant.

15 Case No. 17-cr-00071 RSM

16 **STIPULATED MOTION TO MODIFY
17 DEFENDANT'S CONDITIONS OF
18 RELEASE**

19 Note for hearing: March 3, 2023

20 The parties hereto stipulate and agree as follows:

21 1. On January 12, 2023, Magistrate Judge Mary Alice Theiler entered an Appearance
22 Bond for the Defendant Hamead Abdullahi after his initial appearance on alleged supervised
23 release violations. The Appearance Bond released the Defendant from any custody requirement
24 on special conditions, including, but not limited to, that he be placed in a halfway house with
25 release privileges as determined by Pretrial Services. The Defendant's bond also required him to
26 maintain his then-current residence as directed until a Residential Reentry Center ("RRC") became
available.

27 2. On January 14, 2023, the defendant reported to the Tacoma RRC as directed by the
28 US. Probation Office.

29 **STIPULATED MOTION TO MODIFY
30 DEFENDANT'S CONDITIONS
31 OF SUPERVISED RELEASE
(Case No. 17-cr-00071 RSM)- 1**

32 MORGAN, LEWIS & BOCKIUS LLP
33 Attorneys at Law
34 1301 Second Avenue, Suite 2800
35 Seattle, WA 98101
36 +1.206.274.6400

1 3. On January 26, 2023, the Court entered a modification to Defendant's conditions
2 of release requiring the Defendant to reside at an RRC for up to 120 days or as otherwise directed.
3 At that time, according to the Probation Officer, the Defendant requested placement at the Tacoma
4 RRC due to employment reasons.

5 4. On February 24, 2023, the defendant appeared before the Court for an evidentiary
6 hearing on the alleged supervised release violations and for disposition on violations the defendant
7 had admitted. After hearing testimony from the assigned Probation Officer, the Court continued
8 the disposition hearing for a period of 60 days to further assess the defendant's compliance with
9 the terms of his supervised release.

10 4. Since the Court's modification of Defendant's conditions of release, as noted above
11 in paragraph 3, the Defendant has enrolled in a licensed barber school located in North Seattle.
12 The Defendant's course curriculum begins on March 6, 2023. As a result, the Defendant and the
13 Probation Officer are asking the Court to modify the conditions so that Mr. Abdullabi will be
14 transferred to the Seattle RRC to accommodate transportation for his education.

15 5. The Probation Officer, the United States Attorney's Office and the Defendant agree
16 that the terms of the Defendant's supervised release should be modified to permit the Bureau of
17 Prisons to transfer the defendant to the Seattle halfway house.

Therefore, the parties request the Court to enter the Order set forth below.

19 Date: March 3, 2023

MORGAN, LEWIS & BOCKIUS LLP

21 By: s/Angelo J. Calfo
22 Angelo J. Calfo, WSBA No. 27079
23 1301 Second Avenue, Suite 2800
Seattle, WA 98101
Phone: 206-274-6400
Email: angelo.calfo@morganlewis.com

Attorneys for Defendant

26 STIPULATED MOTION TO MODIFY
DEFENDANT'S CONDITIONS
OF SUPERVISED RELEASE
(Case No. 17-cr-00071 RSM)- 2

MORGAN, LEWIS & BOCKIUS LLP
Attorneys at Law
1301 Second Avenue, Suite 2800
Seattle, WA 98101
+1 206 274 6400

1
2 -and-
3

4 **U.S. ATTORNEY'S OFFICE**
5

6 By: s/Jessica M. Manca
7 Jessica M. Manca, WSBA No. 42337
8 700 Stewart Street, Suite 5220
9 Seattle, WA 98101
10 Phone: 206-553-7970
11 Email: Jessica.manca@usdoj.gov

12 *Attorneys for the United States*
13

14
15
16
17
18
19
20
21
22
23
24
25
26 STIPULATED MOTION TO MODIFY
DEFENDANT'S CONDITIONS
OF SUPERVISED RELEASE
(Case No. 17-cr-00071 RSM)- 3

MORGAN, LEWIS & BOCKIUS LLP
Attorneys at Law
1301 Second Avenue, Suite 2800
Seattle, WA 98101
+1.206.274.6400

1

ORDER

3 The Court, having read and reviewed the above stipulated motion of the parties, and good
4 cause appearing, ORDERS that the Defendant's conditions of supervised release shall be
5 modified as follows:

6 The defendant shall reside in and satisfactorily participate in the Seattle Residential
7 Reentry Center program located at 220 11th Ave, Seattle, WA 98122, as a condition of
8 supervised release or probation for up to 120 days or until discharged by the Program Manager
9 or U.S. Probation Officer. The defendant may be responsible for a 25% gross income subsistence
10 fee.

11 DATED this 10 day of March, 2023.

THE HONORABLE RICARDO S. MARTINEZ

26 STIPULATED MOTION TO MODIFY
DEFENDANT'S CONDITIONS
OF SUPERVISED RELEASE
(Case No. 17-cr-00071 RSM)- 4

MORGAN, LEWIS & BOCKIUS LLP
Attorneys at Law
1301 Second Avenue, Suite 2800
Seattle, WA 98101
+1 206 274 6400